

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

W. R. Grace & Co., *et al.*<sup>1</sup>

Reorganized Debtors.

)  
) Chapter 11

) Case No. 01-01139 (KJC)

) (Jointly Administered)  
)

)  
) Hearing Date: January 21, 2015 at 1:00 p.m.

)  
) Re: Docket No. 32470, 32471 and 32484

**JOINT DEFENSE AGREEMENT IN SUPPORT OF OBJECTION TO CLAIM NO. 6078  
FILED BY IRVING SHAFFER, AS TRUSTEE OF THE SHAFFER REALTY  
NOMINEE TRUST AND OF THE BIM INVESTMENT  
TRUST (SUBSTANTIVE OBJECTION)**

**DOCUMENT TO BE KEPT UNDER SEAL**

**PURSUANT TO AND IN ACCORDANCE WITH  
SECTION 107(B) OF THE BANKRUPTCY CODE**

---

<sup>1</sup> The Reorganized Debtors comprise W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") and W. R. Grace & Co.-Conn. ("Grace-Conn.").